

REMARKS/ARGUMENTS

The Applicants originally submitted Claims 1-95 in the application. In previous submissions, the Applicants amended Claims 10-11, 13-14, 16, 23-24, 28-29, 34, 40-41, 43-44, 46, 53-54, 58-59 and 62-91 to correct informalities. Additionally, the Applicants added Claims 96-101 and amended independent Claims 1, 31, 61 and 91. In the present response, the Applicants have amended independent Claim 1 and dependent Claim 2. Support for the amendment can be found on page 33, lines 25-28. Accordingly, Claims 1-101 are currently pending in the application.

I. Rejection of Claims 1-11, 21-22, 27, 31-41, 51-52, 57, 61-71, 81-82, 87, 91-95 and 97-101 under 35 U.S.C. §102

The Examiner has rejected Claims 1-11, 21-22, 27, 31-41, 51-52, 57, 61-71, 81-82, 87, 91-95 and 97-101 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,112,183 to Swanson, *et al.* The Applicants respectfully disagree since Swanson does not teach storing enterprise information in an enterprise database as recited in amended independent Claims 1, 31, 61 and 91.

The present invention relates to assimilating and accessing data at an enterprise level even when the data has been entered and stored at an ancillary system level. (*See* page 2, lines 5-11.) The present invention achieves this assimilating and accessing by layering an enterprise level solution over an existing system level application structure. An enterprise level server is employed to warehouse data that was converted from the ancillary system level in an enterprise database. The functionality of the individual ancillary system applications remains unmodified and each ancillary

system continues to process event information and stores the information locally. (*See* page 33, lines 16-28.)

In contrast, Swanson divides applications into parts or tiers that can be run independently on multiple systems that are connected via a network. (*See* column 3, lines 11-15 and Figure 1A.)

The applications are developed using a three-tiered architecture including a user interface tier 16, a business logic tier 18, a data access tier 20 and a communication interface 22. (*See* column 3, lines 20-24 and Figure 1A.) Thus, the various subsystems of Swanson, such as, the enrollment subsystems 26, the billing subsystems 28, the benefits subsystems 30, *etc.*, are divided into the business logic tier, data access tier and user interface tier. (*See* column 4, lines 42-67, and Figures 1A-2.)

Therefore, Swanson does not even address a layered system as presently claimed wherein there is an enterprise level and an ancillary level. Instead, in Swanson there is one level of applications that includes the three divided tiers of the applications. The communication interface 22 is used to provide inter-tier communication at the single level of the applications. (*See* column 4, lines 18-19 and Figure 1A.) Swanson, therefore, has a single level of applications and is not even concerned with accessing data at an enterprise level when the data has been entered and stored at an ancillary system level. As such, Swanson does not teach catching a message wherein the message was generated by a disparate, ancillary system at **a sub-enterprise level**, converting, **at the enterprise level**, content from the message to enterprise information using the content conversion rules as recited in independent Claims 1, 31, 61 and 91.

Additionally, Swanson does not teach storing the enterprise information in the enterprise database as recited in amended independent Claim 1. On the contrary, Swanson provides no

teaching of warehousing data converted from a message generated at a sub-enterprise level at a database at the enterprise level. Instead of storing data at an enterprise level for access, Swanson provides specialized remote procedure calls that allow communication between different computer systems and the data stored within each system. (*See* column 2, lines 22-26, and Figure 1A.) Thus, Swanson is not even concerned with copying data to an enterprise database but instead is directed to insuring access to data stored in the data access tier of each application.

The Examiner previously asserted that column 8, lines 31-33 and Figure 10 of Swanson discloses storing enterprise information in an enterprise database. (*See* Examiner's Action, page 7.) This section of Swanson, however, teaches that "procedure code data" is stored in a database system that may be a single or different database system. (*See* column 8, lines 22-35.) This section does not teach an enterprise database or content converted from a sub-enterprise level is copied to an enterprise database. Accordingly, Swanson also does not teach storing the enterprise information in the enterprise database as recited in amended independent Claim 1.

Swanson, therefore, for at least the above reasons, does not teach each element of independent Claims 1, 31, 61 and 91 and Claims dependent thereon. Accordingly, the Applicants respectfully request the Examiner to withdraw the §102 rejection with respect to Claims 1-11, 21-22, 27, 31-41, 51-52, 57, 61-71, 81-82, 87, 91-95 and 97-101 and allow issuance thereof.

Additionally, the Applicants point out to the Examiner amended dependent Claim 2. Swanson provides no teaching of maintaining functionality of the disparate, ancillary system including processing event information and storing information locally. As argued above Swanson does not even disclose an ancillary system.

II. Rejection of Claims 12-20, 23-26, 28-30, 42-50, 53-56, 58-60, 72-80, 83-86, 88-90 and 96 under 35 U.S.C. §103

The Examiner has rejected Claims 12-20, 23-26, 28-30, 42-50, 53-56, 58-60, 72-80, 83-86, 88-90 and 96 under 35 U.S.C. §103(a) as being unpatentable over Swanson in view of U.S. Patent No. 6,377,162 to Delestienne, *et al.* The Applicants respectfully disagree.

As discussed above, Swanson does not even teach each element of independent Claims 1, 31, 61 and 91. Additionally, Swanson does not suggest each element of these independent Claims since Swanson does not even disclose an enterprise level and a sub-enterprise level. Additionally, Delestienne has been cited against the subject matter of the above dependent claims and has not been cited to cure the deficiencies of Swanson regarding the independent Claims. Accordingly, the cited combination does not provide a *prima facie* case of obviousness of independent Claims 1, 31, 61 and 91 and Claims dependent thereon. As such, the Applicants respectfully request the Examiner to withdraw the §103(a) rejection of dependent Claims 12-20, 23-26, 28-30, 42-50, 53-56, 58-60, 72-80, 83-86, 88-90 and 96 and allow issuance thereof.

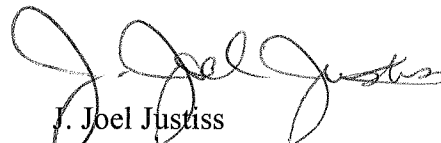
III. Conclusion

In view of the foregoing amendment and remarks, the Applicants now see all of the Claims currently pending in this application to be in condition for allowance and therefore earnestly solicit a Notice of Allowance for Claims 1-101.

The Applicants request the Examiner to telephone the undersigned attorney of record at (972) 480-8800 if such would further or expedite the prosecution of the present application. The Commissioner is hereby authorized to charge any fees, credits or overpayments to Deposit Account 08-2395.

Respectfully submitted,

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Dated: September 19, 2006

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